



IFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT
LANSING



REBECCA A. HUMPHRIES
DIRECTOR

June 10, 2010

Mr. James Blough
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard LR-8J
Chicago, Illinois 60604-3507

US EPA RECORDS CENTER REGION 5



1004974

Dear Mr. Blough:

SUBJECT: Receipt of a Hazardous Waste Management Facility Operating License
Renewal Application; Dynecol, inc.; MID 074 259 565

The Michigan Department of Natural Resources and Environment (DNRE), Waste and Hazardous Materials Division (WHMD), has received a hazardous waste management facility operating license renewal application from Dynecol, Inc., for their hazardous waste storage and treatment facility located in Detroit, Michigan. The facility's current license was issued on March 16, 1998. For further information, please refer to the enclosed public notice.

Because you may receive comments or questions regarding the facility, you will be informed of significant actions taken during the licensing process. Should you require further information, please contact Mr. Richard A. Conforti, Jr., the permit engineer responsible for the review of this application, Hazardous Waste Section, WHMD, at 517-241-2108; confortir@michigan.gov; or DNRE, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,

DeLores Montgomery, Chief
Hazardous Waste Section
Waste and Hazardous Materials Division
517-373-7973

Enclosure

cc: Mr. Steve Buda, DNRE
Mr. Richard A. Conforti, Jr., DNRE
Operating License File

PUBLIC NOTICE
RECEIPT OF A HAZARDOUS WASTE MANAGEMENT FACILITY
OPERATING LICENSE RENEWAL APPLICATION
June 10, 2010

The Michigan Department of Natural Resources and Environment (DNRE) hereby gives notice that Dynecol, Inc., submitted a hazardous waste management facility operating license renewal application (Renewal Application) on September 14, 2007. Dynecol, Inc.'s current hazardous waste management facility operating license issued pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, was issued on March 16, 1998.

Dynecol, Inc., operates its hazardous waste storage and treatment facility located at 6520 Georgia Street, Detroit, Michigan 48211. Dynecol, Inc., provides storage, trans-shipment, and consolidation services for hazardous wastes. Hazardous wastes are stored in containers and tanks and are treated in tanks at the facility. Hazardous wastes include wastes that exhibit a characteristic of ignitability, reactivity, corrosivity, and/or toxicity, and listed hazardous wastes that remain a hazardous waste unless excluded by rule, including wastes from nonspecific and specific sources, discarded commercial chemical products, off-specification species, containers, container residues, and spill residues. John Cannon is the contact person for Dynecol, Inc., and he can be reached by telephone at 313-824-5303.

DNRE staff members are reviewing the Renewal Application to determine if it is complete and technically satisfies all state hazardous waste facility licensing requirements. If the Renewal Application is found to be incomplete, the missing information will be requested from the applicant. As soon as the missing information is provided, the DNRE will proceed with the technical review of the Renewal Application. Based upon this review, the DNRE will propose to reissue or deny the operating license. Prior to a final determination, a public hearing may be held regarding the tentative decision.

A notice will appear in the local newspaper and the DNRE Environmental Calendar and be announced on a local radio station approximately 30 days prior to a public hearing date. At this time, the DNRE is soliciting public comments on the adequacy of the Renewal Application and any issues associated with the facility's past operation. Comments should be sent to the address shown below by July 12, 2010.

Dynecol, Inc.'s Renewal Application is available for inspection at the DNRE, Waste and Hazardous Materials Division, Constitution Hall, Atrium North Level, 525 West Allegan Street, Lansing, Michigan (contact Richard A. Conforti, Jr., at 517-241-2108); at the DNRE, Southeast Michigan District Office, 27700 Donald Court, Warren, Michigan (contact Jeanette Noechel at 586-753-3846); and at the DNRE, Detroit Field Office, Cadillac Place, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan (contact Wilhemina McLemore at 313-456-4685).

To receive future departmental notifications concerning this facility, please submit a written request for placement on the Dynecol, Inc., mailing list to the address below. Questions regarding the facility should be addressed to:

Richard A. Conforti, Jr.
Waste and Hazardous Materials Division
Michigan Department of Natural Resources and Environment
P.O. Box 30241
Lansing, Michigan 48909-7741



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: <http://www.deq.state.mi.us>

RUSSELL J. HARDING, Director

REPLY TO

WASTE MANAGEMENT DIVISION
PO BOX 30241
LANSING MI 48909-7741*Shaw*

February 4, 1997

CERTIFIED MAIL

Mr. Frank Biermann, President
Dynecol, Inc.
6520 Georgia Street
Detroit, Michigan 48211

Dear Mr. Biermann:

SUBJECT: Technical Notice of Deficiency (NOD)/Letter of Warning,
Hazardous Waste Operating License Reapplication, Dynecol, Inc.,
Detroit, Wayne County (Dynecol): MID 074 259 565

The Michigan Department of Environmental Quality (MDEQ), Waste Management Division (WMD), has reviewed the subject reapplication for technical adequacy. The reapplication was reviewed for compliance with Part 111 (Hazardous Waste Management) of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); Title 40 of the Code of Federal Regulations (CFR), Part 270, Subpart B; and 40 CFR, Part 264. Based on this review, the reapplication is inadequate and must be revised to address the technical deficiencies listed in the enclosed NOD. In addition to the technical deficiencies in the reapplication, some of the deficiencies outlined in the WMD's July 11, 1996 Completeness NOD remain unresolved. However, Dynecol indicated in its October 14, 1996 response to the Completeness NOD that it would address the completeness deficiencies either during the WMD's technical review of the reapplication or upon clarification of the issues by the WMD. Therefore, the outstanding completeness deficiencies, along with the technical deficiencies in the reapplication, have been listed in the enclosed NOD.

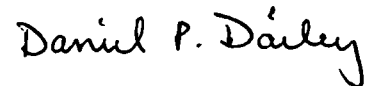
Please be advised that failure to submit a complete operating license reapplication is a violation of R 299.9502(2)(a) and Condition I.E.2 of Dynecol's operating license, effective May 2, 1990. Failure to submit a complete operating license reapplication within 30 days after receipt of this letter may result in a civil penalty pursuant to Section 11151 of Part 111. Failure to submit a complete and technically adequate operating license reapplication is also grounds for denial of the reapplication pursuant to R 299.9518(2)(c) and revocation of the operating license pursuant to R 299.9519(11)(c).

Six copies of revised, replacement pages for the reapplication must be submitted to this office pursuant to the following schedule: within 30 days after receipt of this letter for the unresolved completeness deficiencies; and within 90 days after receipt of this letter for the technical deficiencies. Please submit revised, replacement pages with instructions for inserting the pages into the reapplication. The replacement page format will enable the WMD to conduct a more efficient review of the revised reapplication. If Dynecol needs more time to respond to this letter, it must submit a written request for an extension.

For your information, I have also enclosed the Guidance Document for Verification of Soil Remediation, April, 1994 (VSR).

If you have any questions, please contact me. The WMD would be happy to discuss these deficiencies in a meeting or by conference call.

Sincerely,

A handwritten signature in black ink that reads "Daniel P. Dailey". The signature is written in a cursive style with a large, stylized 'D' and 'P'.

Daniel P. Dailey, Environmental Engineer
Hazardous Waste Program Section
Waste Management Division
517-335-6610

Enclosures

cc: Detroit Public Library, Main Branch w/enc.
Mr. Hak Cho/Ms. Shari Kolak, U.S. EPA w/enc.
Mr. Ken Burda, MDEQ w/enc., Operating License File
Dr. Ben Okwumabua/Mr. Larry AuBuchon/Ms. Jeanette Noechel, MDEQ-Southeast Michigan w/enc.
Mr. Steve Buda, MDEQ w/enc.
Ms. Virginia Loselle/Mr. Ron Stone, MDEQ w/enc.

**Michigan Department of Environmental Quality
Waste Management Division**

Technical Notice of Deficiency
Hazardous Waste Operating License Reapplication
Dynecol, Inc., MID 074 259 565

February 4, 1997

Unresolved Completeness Deficiencies to be Addressed Within 30 Days

In Dynecol's response to the WMD's July 11, 1996 Completeness NOD for the reapplication, Dynecol indicated that some completeness deficiencies would be addressed during the technical review of the reapplication, or upon further clarification from the WMD. Below, each completeness deficiency that remains unaddressed has been restated and clarified based on discussions between WMD staff and Dynecol. These completeness deficiencies must be addressed within 30 days after receiving this Technical NOD.

- C1. The appendices to the reapplication were not revised to include proof of issuance of all necessary state air and sewer discharge permits (i.e., copies of issued permits), as required by R 299.9508(1)(f). However, Dynecol provided draft copies of these permits in its October 14, 1996 response to the WMD's July 11, 1996 Completeness NOD. In addition, Dynecol indicated in the October 14, 1996 response letter that it expected final issuance of these permits during the WMD's technical review of the reapplication. The reapplication must be revised to include copies of these issued permits.
- C2. The reapplication was not revised to include the seal of an independent registered professional engineer on all plan views, elevations, sections, supplementary views, and general layout drawings included in the reapplication, as required by R 299.9504(1)(g)(i). In accordance with R 299.9508(1)(b), operating license applications shall include all information required for a construction permit application pursuant to R 299.9504. Per Mr. Dan Dailey's telephone conversation with Mr. Frank Biermann on October 2, 1996, the reapplication needs only be revised to include a professional engineer's seal on engineering plans for units that have been newly constructed since Dynecol's previous hazardous waste facility operating license was issued on May 2, 1990. Please refer to Section 23(3) of Part 111 for further clarification. A certification statement by a professional engineer, which contains the wording specified in 40 CFR §270.11(d), is not required.
- C3. Section D of the reapplication was not revised to include copies of tank assessments for all hazardous waste tanks covered by the reapplication that have been newly installed since May 2, 1990, as required by 40 CFR §264.191. Tanks 27, 28, 30, and 31 at the facility require tank assessments. Section D of the reapplication states that Tanks 27 and 28 have been newly installed since May, 1990 and actively manage hazardous wastes. Tanks 30 and 31, which manage effluent waste waters from the hazardous waste treatment process, are hazardous waste storage tanks for the following reasons:

R 299.9203(3) states, "... any waste generated from the treatment, storage, or disposal of a hazardous waste, ... is a hazardous waste." The effluent managed in Tanks 30 and 31 is a hazardous waste since it is generated from the treatment of listed hazardous wastes at the facility. R 299.9204(1)(b) states, "the following materials are not wastes [and therefore not hazardous

wastes] for the purpose of part 111...: (b) Industrial waste water discharges that are point source discharges subject to regulation pursuant to the provisions of Section 402 of the federal clean water act...". The effluent managed in Tanks 30 and 31 does not qualify for this exemption, because the tanks are not permitted under the federal Clean Water Act's National Pollutant Discharge Elimination System. Furthermore, R 299.9204(1)(a) states, "...Domestic sewage and any mixture of domestic sewage and other wastes that passes through a sewer system to a publicly owned treatment works for treatment [is not a waste]." However, until the waste waters pass through the sewer system, they remain hazardous wastes.

In accordance with R 299.9503(1)(f)(ii), owners or operators of wastewater treatment units do not require an operating license pursuant to Part 111 if the units are located on the site of a generator and do not treat waste from any other generator, unless the waste is shipped entirely by pipeline or the off-site generator has the same owner as the facility at which the unit is located. Tanks 30 and 31 do not qualify for this exemption, since the waste waters treated are derived from hazardous wastes received in bulk tankers from off-site generators, and those generators are not owned by Dynecol. Therefore, Tanks 30 and 31 are required to be licensed under Part 111.

Therefore, in accordance with R 299.9615(3), Section D must be revised to include a tank assessments for Tanks 27, 28, 30, and 31, or Section D must be revised to include a proposed schedule by which the tank assessments shall be completed.

Technical Deficiencies to be Addressed Within 90 Days

The following technical deficiencies in the reapplication must be addressed to satisfy the technical requirements of Part 111. These deficiencies must be addressed within 90 days after receiving this Technical NOD.

- T1. Section C-1d(i), Page C-6 (dated 10/14/96), states that treated effluent from the hazardous waste treatment process "...is exempt from hazardous waste regulations under the domestic sewage exclusion in 40 CFR §261.4." In addition, Section D-2a, Page D-9 (dated 11/01/94), states, "Tanks 30 and 31 ... are typically used to hold effluent for quality control before discharge to the City of Detroit sewer." Furthermore, Section D-2(c)(iii)(d), Page D-12 (dated 11/01/94) states, "Treated effluent from the filter press may be subjected to carbon adsorption. This can be performed by routing the effluent from either Tank No.30 or No.31 through a system composed of an in-line filter and two 1,000-pound carbon vessels in parallel." In accordance with R 299.9204(1)(a), however, the effluent from the hazardous waste treatment process is a hazardous waste until it passes through the sewer system. Furthermore, in accordance with R 299.9503(1)(f)(ii), wastewater treatment units that treat hazardous wastes from off-site generators (unless the waste is hard piped to the facility from the generator, or the generator is owned by Dynecol) are not exempt from Part 111 licensing requirements. Therefore, the reapplication must be revised to provide the appropriate licensing information for Tanks 30 and 31, and the two 1,000-pound carbon vessels, pursuant to 40 CFR, Part 264, Subpart J, and R 299.9504(5), as appropriate.
- T2. Section D must be revised to indicate the waste materials that are stored in Tanks Seven and 10 at the facility pursuant to 40 CFR Part 264, Subpart J. Pursuant to Section D, pages D-8 and D-15, these tanks are not listed as managing hazardous wastes. However, during a recent inspection of the facility, WMD staff were informed by Dynecol personnel that these tanks are both currently used to store listed and characteristic hazardous wastes. Section D must be revised to provide an

accurate accounting of the materials stored in these tanks, and must specify whether the materials stored are generated on-site or received from off-site.

- T3. Section I-1d(i), Page I-6 (dated 11/01/94) states that two background samples will be taken in unimpacted areas and used to determine whether there is a statistically significant concentration of contaminants in soils. However, two soil samples are not sufficient to establish a statistically valid background. A minimum of four samples must be taken from areas unimpacted by site activities to help account for natural constituent occurrences and inherent variability within each distinctive soil horizon. Based on the waste type, contaminant mobility, operation practices, and soil type (sand, silty sand, clay), an estimate of contamination depth should be made and background samples taken at comparable depths for the particular soil type. Multiple soil horizons should have "background" established separately (e.g., a minimum of four samples per each soil unit). For further information regarding establishing soil background and acceptable statistical analysis for establishing background conditions for medium to large facilities, please refer to the enclosed VSR. The VSR replaces former MDEQ guidance regarding establishing background, including "How Clean is Clean," and "MDNR Cleanup Verification Guidance Document." Section I-1d(i) must be revised to be consistent with the recommendations of the VSR or must be revised to provide a statistically valid method for determining background concentrations of contaminants.

In addition, Section I must be revised to provide for a demonstration that organics are a "background" or site-wide problem prior to using statistical methods to determine the impacts of organics on environmental media. If this demonstration cannot be made, then organic contaminants in soils and groundwater must be contained, removed, or otherwise remedied, using the Type A, Type B, and/or Type C criteria specified under Part 201 (Environmental Response) of Act 451. This is necessary because organic contaminants do not typically occur naturally in environmental media and, therefore, do not usually represent a "background" condition in soils and groundwater.

- T4. Section I-1d(ii), Page I-8 (dated 11/01/94) states that sampling of the concrete and underlying soil in the container storage area will be unnecessary. This section must be revised to state that at closure the container storage area, loading and unloading dock and truck bay, and container bulking area shall be inspected for cracks and gaps. If any are found, Dynecol shall submit a closure plan amendment that provides for soil sampling beneath the concrete secondary containment of these areas. In addition, this section must be revised to include an inspection of the on-site truck transport routing areas for wastes which have been bulked into trucks from on-site containers for on-site treatment. This is necessary to address all areas where hazardous waste activities may have impacted the facility, and to satisfy the closure performance standard of 40 CFR §264.111.

- T5. Section I-4, Page I-11 (dated 11/01/94) must be revised to include the following items in addition to those listed for the closure certification, as required by R 299.9613:

- * Sampling and analysis procedures;
- * A map showing locations of samples;
- * Statistical evaluations;
- * Destinations of wastes removed, where manifests have not been provided;
- * Final depths of excavations and elevations and fill material used; and
- * Any other documentation required to support the certification of the independent registered Professional Engineer.



JOHN ENGLER, Governor
DEPARTMENT OF ENVIRONMENTAL QUALITY
HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973
RUSSELL J. HARDING, Director

REPLY TO:

WASTE MANAGEMENT DIVISION
PO BOX 30241
LANSING MI 48909-7741

RECEIVED

JUL 16 1996

**OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA REGION V**

July 11, 1996

CERTIFIED MAIL

Mr. Tien Pham, Manager
Dynecol, Inc.
6520 Georgia Street
Detroit, Michigan 48211

Dear Mr. Pham:

SUBJECT: Notice of Deficiency, Administrative Completeness, Hazardous Waste Operating License Reapplication, Dynecol, Inc., Detroit, Wayne County: MID 074 259 565

The Michigan Department of Environmental Quality (MDEQ), Waste Management Division (WMD), has reviewed the subject reapplication for administrative completeness. The reapplication was reviewed for compliance with 40 CFR Part 270, and Part 111 of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. The reapplication is deficient and must be revised to address the enclosed comments.

Six copies of a revised reapplication (or revised, replacement pages for the current reapplication) must be submitted to this office within 90 days after receipt of this letter. Please submit revised, replacement pages with instructions for inserting the pages into the reapplication. The replacement page format will enable the WMD to conduct a more efficient review of your revised reapplication. If you need more time to respond to this letter, you must submit a written request for an extension.

If you have any questions, please contact me. The WMD is willing to discuss the enclosed comments by telephone or in a meeting.

Sincerely,

Daniel P. Dailey
Hazardous Waste Program Section
Waste Management Division
517-335-6610

Mr. Tien Pham

-2-

July 11, 1996

Enclosure

cc/enc:

Detroit Public Library, Main Branch

[REDACTED]

Mr. Ken Burda, MDEQ/Operating License File

Mr. Steve Buda, MDEQ

Mr. Larry AuBuchon/Mr. Ishan Mirza, MDEQ-Livonia

Ms. Virginia Loselle, MDEQ

Mr. Ron Stone, MDEQ

**Michigan Department of Environmental Quality
Waste Management Division**

Notice of Deficiency: Administrative Completeness

January 3, 1995

Hazardous Waste Operating License Reapplication

**Dynecol, Incorporated
MID 074 259 565**

July 11, 1996

General Information

1. The reapplication must be revised to include a Part A hazardous waste permit application form, including facility photographs of treatment and storage areas. The Part A application is required in addition to the application form provided by the director that must be included in the application. This is required by R 299.9504(1)(b) and 40 CFR §270.13.
2. Section O of the reapplication must be revised to include a certification statement worded in accordance with 40 CFR §270.11(d) that is signed by the owner of the facility: PVS Chemicals, Inc. The signatory for PVS Chemicals, Inc. must meet the requirements of 40 CFR §270.11(a). This is required by R 299.9508(3) and 40 CFR §270.11.
3. The appendices to the reapplication must be revised to include proof of issuance of all necessary state air and sewer discharge permits (i.e., copies of issued permits). Copies of air use permits for the facility were not included in the reapplication. A copy of the current facility sewer discharge permit for the facility was also not included in the reapplication. This is required by R 299.9508(1)(f).

Corrective Action

4. Section K of the reapplication must be revised to include the location of waste management units at the facility on the topographic map. In addition the reapplication must be revised to specify the type, size, operation dates, and wastes managed for each waste management unit identified. This is required by R 299.9504(16) and 40 CFR §270.14(d)(1)(i-v).
5. Section K of the reapplication must be revised to include the results of any environmental sampling and analyses related to corrective actions at the facility. This information was not provided in Section K of the reapplication. This is required by R 299.9504(16) and 40 CFR §270.14(d)(3).

6. Section K of the reapplication must be revised to include a summary of the status of facility corrective action activities to date. This is required by R 299.9504(16) and Section 11115a of Part 111 of Act 451.

Environmental Monitoring Program

7. Section L of the reapplication must be revised to include a copy of the soil monitoring waiver and the approval letter for the waiver. While approval of the waiver is mentioned in Section L, copies of the waiver justification and approval must be provided in the reapplication. This is required by R 299.9504(1)(f) and R 299.9611(2)(d), (3), and (4).

Engineering Plans and Specifications

8. The reapplication must be revised to include the signature and seal of an independent registered professional engineer on all plan views, elevations, sections, supplementary views, and general layout drawings included in the reapplication. A list of all plan views, elevation, sections, supplementary views, and general layout drawings that includes a certification with the language in 40 CFR §270.11(d), and is signed and sealed by a registered professional engineer would also be acceptable. This is required by R 299.9504(1)(g)(i).

Tank Storage and Treatment Information

9. Section D of the reapplication must be revised to include copies of tank assessments for all hazardous waste tanks covered by the reapplication. Tank assessments must meet the requirements of 40 CFR §264.191. In addition, the tank assessments must be signed, sealed, and certified by a registered professional engineer using the certification language in 40 CFR §270.11(d). This is required by R 299.9504(3), R 299.9615, and 40 CFR §§ 270.15 and 264.191.

Air Emissions from Process Vents and Equipment Leaks

10. The reapplication must be revised to address air emissions from process vents and equipment leaks related to air sparging operations and related equipment which handle greater than 10 ppmw organics. The revisions must meet the requirements of 40 CFR Part 264, Subparts AA and BB. This is required by R 299.9504(12) and (13), R 299.9630, R 299.9631, and 40 CFR §§ 270.24 and 270.25.

Environmental and Human Health Standards

11. The reapplication must be revised to specify how the facility complies with the requirements of R 299.9602 (General Environmental and Human Health Standards). This is required by R 299.9504(16) and R 299.9602.

Reporting

12. The reapplication must be revised to include provisions for reporting unmanifested wastes that may be received by the facility (e.g., orphan drums). This is required by R 299.9610(2).

Shari

JUN 6 1996

DRP-8J

Mr. Kenneth J. Burda, Chief
Hazardous Waste Program Section
Waste Management Division
Department of Environmental Quality
P.O. Box 30473
Lansing, Michigan 48909-7973

Dear Mr. Burda:

This letter is to acknowledge receipt of your May 23, 1996, letter regarding the Dynecol, Inc. RCRA permit reapplication. I also received a copy of the public notice announcing the Michigan Department of Environmental Quality's (MDEQ) and United States Environmental Protection Agency's receipt of the company's permit reapplication. Based on my review of the FY96 Grant Workplan, I did not see Dynecol, Inc. listed as a commitment. I am unclear as to whether this review will replace another commitment identified in the FY 96 Workplan.

Please note that Ms. Shari Kolak of my staff will review and coordinate comments on the federal portion of the reapplication with Mr. Dan Dailey by August 31, 1996. If you have any questions regarding the federal review of the reapplication, please contact Ms. Kolak at (312) 886-6151.

Sincerely,

Hak Cho, Chief
IL/TN/MI Section
Waste Management Branch

cc: Dan Dailey (MDEQ)
Steve Buda (MDEQ)

JUN 06 1996

DRP-8J

Mr. Kenneth J. Burda, Chief
Hazardous Waste Program Section
Waste Management Division
Department of Environmental Quality
P.O. Box 30473
Lansing, Michigan 48909-7973

Dear Mr. Burda:

This letter is to acknowledge receipt of your May 23, 1996, letter regarding the Dynecol, Inc. RCRA permit reapplication. I also received a copy of the public notice announcing the Michigan Department of Environmental Quality's (MDEQ) and United States Environmental Protection Agency's receipt of the company's permit reapplication. Based on my review of the FY96 Grant Workplan, I did not see Dynecol, Inc. listed as a commitment. I am unclear as to whether this review will replace another commitment identified in the FY 96 Workplan.

Please note that Ms. Shari Kolak of my staff will review and coordinate comments on the federal portion of the reapplication with Mr. Dan Dailey by August 31, 1996. If you have any questions regarding the federal review of the reapplication, please contact Ms. Kolak at (312) 886-6151.

Sincerely,

Hak Cho, Chief
IL/IN/MI Section
Waste Management Branch

cc: Dan Dailey (MDEQ)
Steve Buda (MDEQ)

Hak
6-6-96
Chief
→

Staff
→ Shari Kolak

STATE OF MICHIGAN



JOHN ENGLER, Governor
DEPARTMENT OF ENVIRONMENTAL QUALITY
HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

RUSSELL J. HARDING, Director

May 23, 1996

REPLY TO:

WASTE MANAGEMENT DIVISION
PO BOX 30241
LANSING MI 48909-7741

RECEIVED
JUN 04 1996

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA REGION V

Mr. Hak Cho, Chief (HRP-8J)
IL/IN/MI Permits Section
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Dear Mr. Cho:

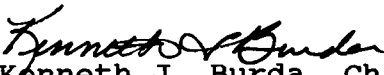
SUBJECT: Receipt of a Hazardous Waste Facility Operating License
Reapplication for Dynecol, Inc., Detroit, Wayne County;
MID 074 259 565

On January 4, 1995, the Waste Management Division received a hazardous waste management facility operating license reapplication from Dynecol, Inc. located in Detroit, Michigan. Enclosed is a copy of the public notice announcing our receipt of the reapplication. A copy of the reapplication has been sent directly to Ms. Shari Sutker of your staff. A copy of the public notice, which is scheduled to appear in the *Detroit Free Press* on May 30, 1996, is also enclosed for your information.

Mr. Dan Dailey, the permit engineer responsible for the review of this reapplication, is coordinating the reviews of the appropriate agencies. He expects to finish his review of the reapplication by August 31, 1996. Please have your staff coordinate the Hazardous and Solid Waste Amendments permitting process for the facility with Mr. Dailey, as appropriate. Copies of all correspondence regarding the reapplication should be forwarded to Mr. Dailey.

Thank you for your cooperation in this matter. If you have any questions or comments regarding the reapplication, please contact Mr. Dailey at 517-335-6610.

Sincerely,


Kenneth J. Burda, Chief
Hazardous Waste Program Section
Waste Management Division
517-373-0530

Enclosure

cc: Ms. Shari Sutker, U.S. EPA
Mr. Larry AuBuchon/Mr. Chris Silva, MDEQ-Livonia
Mr. Dan Dailey, MDEQ/Operating License File

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PUBLIC NOTICE

HAZARDOUS WASTE FACILITY OPERATING LICENSE REAPPLICATION RECEIVED

On January 4, 1995, the Michigan Department of Environmental Quality (MDEQ) and the United States Environmental Protection Agency (U.S. EPA) received a hazardous waste management facility operating license reapplication from Dynecol, Inc. (Dynecol). On May 2, 1990, Dynecol was issued an operating license pursuant to Michigan's Hazardous Waste Management Act, 1979 PA 64, as amended (Act 64). On June 2, 1990, Dynecol was issued a permit pursuant to the federal Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA). Dynecol's Act 64 license expired on May 2, 1995. However, since Dynecol submitted a timely reapplication for its license, the facility may continue to operate under its expired license until the MDEQ and U.S. EPA make a final decision on Dynecol's reapplication.

Dynecol operates its commercial hazardous waste storage, treatment, and transportation facility at 6520 Georgia Street in Detroit, Michigan. Storage of organic and inorganic, characteristic and listed hazardous wastes occurs in tanks and containers. Primary treatment of the hazardous wastes is accomplished in above-ground tanks by chemical oxidation, reduction, neutralization, and adsorption. Waste waters from the primary treatment process are further treated to remove solids prior to discharge to the City of Detroit Sewer System. Solids are dewatered by filter press and sent off-site for recycling or disposal.

In the reapplication, Dynecol is proposing to continue storage, treatment, and transportation operations at the facility. In addition, Dynecol proposes to add waste codes to the list of hazardous wastes acceptable for storage and treatment, and to transfer its hazardous waste treatment and storage capacity between tanks and containers at the facility. This transfer of capacity will not result in an increase in the overall capacity for storage and treatment of hazardous wastes at the facility.

The MDEQ and U.S. EPA staff are reviewing the company's reapplication to determine if it is complete and technically satisfies all state and federal hazardous waste facility licensing requirements. Based on this review, the MDEQ and U.S. EPA will propose to reissue or deny the operating license. If the reapplication is incomplete, the missing information will be requested from the applicant, and the persons on the facility mailing list will be notified. Prior to a final determination, a 45 day public comment period, which includes a public hearing, will be held regarding the draft decision. A notice in this publication will announce the beginning and end of the public comment period. The notice will appear about 30 days prior to any hearing date for the agency's draft decision on the reapplication. At this time, the MDEQ and U.S. EPA request written public comments on the reapplication, the proposed corrective action program, and any issues related to the facility's past operations. Written comments should be sent to the address below by August 31, 1996.

The administrative record for the reapplication is on file at the MDEQ Waste Management Division Office located on the first floor of the John A. Hannah Building in Lansing, Michigan (contact Mr. Daniel Dailey at 517-335-6610). In addition, copies of the reapplication are available for review at: The U.S. EPA Region 5 Office, Waste Management Branch, located at 77 West Jackson Boulevard, Chicago, Illinois 60604-3590 (contact Ms. Shari Sutker at 312-886-6151); the MDEQ Southeast Michigan District Headquarters, located at 38980 Seven Mile Road in Warren, Michigan 48152 (contact Mr. Chris Silva at 313-953-1457); and at the Detroit Public Library, Main Branch, located at 5201 Woodward Avenue in Detroit, Michigan

(contact the Sociology & Economics Reference Desk, Tuesday through Saturday during normal business hours, at 313-833-1440).

To receive future MDEQ notification concerning this facility, please submit a written request for placement on the Dynecol mailing list. Requests, comments, and questions regarding the facility should be addressed to:

Mr. Daniel Dailey
Department of Environmental Quality
Waste Management Division
P.O. Box 30241
Lansing, Michigan 48909



DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
PHONE: (313) 571-7141
FAX: (313) 571-7190

January 03, 1995

Ms. Shari Sutker
U.S. EPA Region V
77 West Jackson Boulevard
Chicago, IL 60604-3590

Dear Ms. Sutker:

SUBJECT: Dynecol, Inc.
MID 074 259 565
RCRA Permit Reapplication Submittal (2-volumes)

In reference to your letter of November 15, 1994, please find enclosed a copy of our RCRA Permit Reapplication Package.

Should you have any questions concerning this submittal, please feel free to contact me.

Truly yours,

A handwritten signature in cursive script, appearing to read 'Tien H. Pham', written in dark ink.

Tien H. Pham
Manager, Technical Services

cc: EPA-RCRA Permit File



60 (61)



DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
PHONE: (313) 571-7141
FAX: (313) 571-7190

January 3, 1995

RECEIVED

JAN 10 1995

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Ms. Cheryl Howe
Senior Environmental Engineer
Department of Natural Resources
Waste Management Division
Hazardous Waste Permits Section
P.O. Box 30241
Lansing, MI 48909

Dear Cheryl:

SUBJECT: Dynecol, Inc. (MID 074 259 565)
Act 64 Permit Reapplication Submittal

In reference to MDNR's letter of October 27, 1994, please find eight (8) copies of our Act 64 Permit Reapplication Package along with a check for \$500 (Operating License Fee). Please note the following items represent, to the best of Dynecol's judgement, the significant issues that are reflected in this submittal:

- (1) Since we are currently managing certain TC organics under interim status, the list of TC organics which includes four (4) new waste codes, i.e., D020 (Chlordane), D030 (2,4-Dinitrotoluene), D031 (Heptachlor), and D038 (Pyridine), is submitted in this Act 64 Permit Reapplication for approval and upgrading to permanent status.
- (2) In regard to the Other Listed Wastes Treatment System, this is substantially the same proposal as the one previously submitted as a separate permit modification document on February 12, 1991.
- (3) Additional waste codes which are not currently included in the list of acceptable waste codes for the Container Management Facility (CMF) are being proposed for their inclusion under the new permit. These waste codes are as follows:
 - (a) Newly promulgated waste codes since May 1990.
 - (b) Waste codes subject to limitations established for the Other Listed Wastes managed in the bulk treatment facility. These are listed hazardous wastes (primarily wastes generated as a result of the mixture and derived from rule) and are otherwise characteristically similar to the wastes currently treated in the bulk treatment facility.



Page 2 of 2, 01/03/95
Ms. Cheryl Howe

(4) In reference to our letter of March 12, 1991, the following treatment/storage capacity transfer is being proposed in this Permit Reapplication:

- (a) The treatment capacity (20,000 gallons) of primary treatment tank #1 will be converted to the Listed Wastes/Other Listed Wastes treatment system;
- (b) The former tank #1 will then be removed from hazardous waste treatment;
- (c) Transfer 20,000 gallons of storage capacity combined from regulated tank #'s 7 and 10 (22,000 gallons total) to the now non-regulated tank #1 (20,000 gallons) and the remaining 2,000 gallons balance from tank #'s 7 and 10 (22,000 - 20,000) to the Container Management Facility (CMF); and
- (d) Remove tank #'s 7 and 10 from hazardous waste service.

This will leave the facility with:

- 1. 60,000 gallons of primary treatment capacity (Tank #'s 2-4);
- 2. 20,000 gallons of Listed Wastes/Other Listed Wastes treatment capacity (Tank #27);
- 3. 80,000 gallons of secondary treatment capacity (Tank #'s 18-21);
- 4. 41,000 gallons of total storage capacity for the Container Management Facility (CMF); and
- 5. 20,000 gallons of bulk hazardous waste storage (Tank #1).

Should you have any questions concerning this submittal, please feel free to contact me.

Truly yours,



Tien H. Pham
Manager, Technical Services

cc: Ms. Shari Sutker, U.S.EPA Region V ✓
MDNR-Permit File

NOV 15 1994

HRP-8J

Mr. Frank J. Biermann, President
Dynecol, Inc.
6520 Georgia Street
Detroit, Michigan 48211

Re: Request for Extension of
RCRA Permit Reapplication
Dynecol, Inc., MID 074 249 565)

Dear Mr. Biermann:

The United States Environmental Protection Agency (U.S. EPA) has reviewed your November 7, 1994, letter requesting an extension for submittal of the Resource Conservation and Recovery Act (RCRA) permit reapplication. Based on a review of your letter, the U.S. EPA hereby approves your request to extend the RCRA permit reapplication deadline from December 4, 1994, to January 4, 1995. This approval only applies to the Federal portion of the RCRA permit.

Please note your requested extension date of February 4, 1995, has been changed to January 4, 1995. This change is necessary to maintain consistency with the reapplication deadline approved by the Michigan Department of Natural Resources. If you have any questions regarding this letter, please contact Shari Sutker of my staff, at (312) 886-6151.

Sincerely,

Richard Traub, Chief
Michigan Section
RCRA Permitting Branch

cc: Cheryl Howe (MDNR)

WMD/OR/RPB/MI/SLS/sls-nl/11-14-94;11-15-94\F:\U\S\L\PERMIT.LTR

CONCURRENCE REQUESTED FROM RPB			
SC/BR SECRTY		11/15 NL	
OTHER STAFF	RPB STAFF	RPB SECTION CHIEF	RPB BRANCH CHIEF
	11/15/94	11/15/94	

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RECEIVED

NOV 14 1994

DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
PHONE: (313) 571-7141
FAX: (313) 571-7190

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

November 7, 1994

Ms. Shari Sutker
U.S. EPA Region V
HRP-8J
77 West Jackson Boulevard
Chicago, IL 60604

Dear Shari:

Subject: Dynecol, Inc. (MID 074 249 565)
Request for Extension of HASWA Permit Reapplication
Submittal Deadline

Under the provisions of 40 CFR 270.10(h) Dynecol is required to submit a new permit application "at least 180 days before the expiration date of the effective permit, unless permission for a later date has been granted by the Director."

Dynecol hereby respectfully requests, under this provision, a submittal date of February 4, 1995 rather than the 180-day date of December 4, 1994.

Earlier this year, we decided to use WW Engineering and Science as our prime engineering firm for permit work. Sometime after their merger with Earth Tech and the subsequent departure of our lead contact, we found ourselves needing to accelerate the required engineering work. While we are prepared to meet the December 4 deadline, it is my belief that all parties involved would benefit greatly from the requested extension in order to enhance the quality of the work submitted.

I would certainly appreciate your prompt consideration of this matter.

Yours truly,

Frank J. Biermann
President

cc: EPA-Permit File



849

STATE OF MICHIGAN

NATURAL RESOURCES
COMMISSION

JERRY C. BARTNIK
LARRY DEVUYST
PAUL EISELE
JAMES HILL
DAVID HOLLI
JOEY M. SPANO
JORDAN B. TATTER



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

John Hannah Building, P.O. Box 30241, Lansing, MI 48908

ROLAND HARMES, Director

RECEIVED

NOV 03 1994

**OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V**

October 27, 1994

Mr. Frank J. Biermann, President
Dynecol, Inc.
6520 Georgia Street
Detroit, Michigan 48211

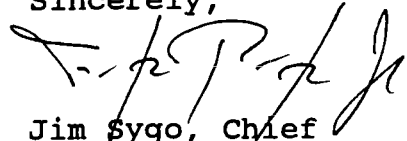
Dear Mr. Biermann:

SUBJECT: Request for Extension of Reapplication Submittal Date
MID 074 259 565

The Waste Management Division, Hazardous Waste Program Section staff have reviewed your October 14, 1994 letter to Mr. Kenneth Burda requesting an extension of the date for submittal of the hazardous waste facility operating license reapplication for Dynecol, Inc. The requested two-month extension from November 4, 1994 to January 4, 1995 is approved.

If you have any questions or require assistance with the reapplication, please contact Ms. Cheryl Howe at 517-373-9881.

Sincerely,


Jim Sygo, Chief
Waste Management Division
517-373-9523

cc: Ms. Lorraine Kosik, U.S. EPA
Ms. Shari Sutker, U.S. EPA
Dr. Ben Okwumabua/Mr. Chris Silva, DNR-Livonia
Mr. Kenneth Burda, DNR
Mr. Steve Buda, DNR
Ms. Ginny Loselle, DNR
Ms. Cheryl Howe, DNR/Operating License File





DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
(313) 571-7141

July 18, 1991

U. S. EPA - Region V
230 S. Dearborn Street
Chicago, Il. 60604

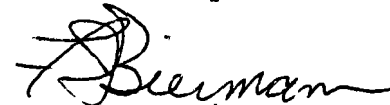
Attn: Ms. Chari Kolak
Ref: MID# 074 259 565

Dear Sirs or Madams:

Under the terms of our Michigan Act 64 TDS permit, Dynecol's Contingency Plan requires notification to EPA of implementation of that plan.

Please find attached a report on an air release on July 5, 1991.

Yours truly,


Frank J. Biermann
President

FJB/ryb

3



DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
(313) 571-7141

July 10, 1991

Michigan Department of Natural Resources
Waste Management Division
P.O. Box 30241
Lansing, MI 48909

Attn: Mrs. Mindy Koch
Acting Director

Dear Mrs. Koch:

RE: MID 074 259 565

Please find enclosed a written report on the noncompliance incident at Dynecol on July 6th. In addition, the following information is presented:

1. On the evening of July 3rd we received the acid load in question (manifest attached). The fingerprint sample was approved and the load was subsequently off-loaded into Tank #3.
2. Our normal mode is to treat waste promptly, rather than store it for any period of time. Due to the holiday period, this load was an exception.
3. Our initial conclusion at the time, based upon knowledge of the particular waste and the color of the release, was that it was a "nitric" reaction. It moved in a northern direction, toward an apparently vacant Ashland Chemical property, and it dissipated quickly. In our opinion, it posed no threat to health or environment, but did necessitate contacting Wayne County Health Department.
4. It was our subsequent full evaluation that led to the conclusion that the small quantities of nitric acid were likely reduced to NO_2 by the possible presence of some small amounts of iron residues at the bottom of the tank. The continual introduction of Oxygen through the air sparger possibly played a part in the unusual delayed reaction.

In conclusion, we at Dynecol regret this unusual circumstance and are pledged to the prevention of future occurrences through changes that we have made.

I would be pleased to address any further questions and can be reached at (313) 571-7140.

Yours truly,

Frank J. Biermann
President

FJB/cam

Enclosure

INCIDENT RELEASE FOLLOW-UP REPORT

DATE OF REPORT: July 10, 1991

LOCATION: Dynecol, Inc.
6520 Georgia Street
Detroit, MI 48211
(313) 571-7141

DATE OF RELEASE: July 6, 1991

CHEMICAL RELEASED: Nitrogen Dioxide

SARA TITLE III STATUS: Extremely Hazardous Substance

ESTIMATED QUANTITY RELEASED: Maximum of 2,925 pounds
of NO₂

TIME AND DURATION OF RELEASE: Incident Started: 1830 hours
Incident Ended: 2130 hours
Duration: 3.0 hours

MEDIA AFFECTED: Air: caused by iron reduction of a trace amount (1-4%) of nitric acid contained in 33% sulfuric acid stored at facility. Emission thru 66 foot scrubber stack.

KNOWN OR ANTICIPATED HEALTH RISKS: none. Workers report no exposure problem. No known off site exposures. Strong wind (15-20 mph) and stack height dissipated release.

PROPER PRECAUTIONS TAKEN: Responding plant operator used respirator for initial response. Facility entry was denied to all unauthorized personnel. No plant personnel or public evacuation was necessary. The local fire department responded. Their HAZMAT inspector subsequently arrived and she determined that no further action would be taken on their part. Initial evaluation perceived release to be Nitrous Oxide and reportable only under Wayne County air permit. Subsequent evaluation determined release to be Nitrogen Dioxide, likely above RQ; the US EPA National Response Center and Michigan DNR were then immediately notified, on a non-emergency reporting basis.

CONTACT FOR FURTHER INFORMATION:

Mr. Frank J. Biermann, (313) 571-7140
Mr. Tien Pham, (313) 571-7140

ACTION TAKEN TO RESPOND TO AND CONTAIN RELEASE: Plant Emergency Response Coordinator was initially called at home by security guard. After preliminary assessment and reduction of air to tank, Chief Plant Operator was called to initiate neutralization of acid. Future prevention actions include inspection procedures for tank cleanliness, addition of neutralizing agent prior to unloading any nitric acid, and no primary storage of nitric containing streams beyond normal shift operations. Outside analysis pending on nitric content of retained sample.

ANY KNOWN OR ANTICIPATED ACUTE/CHRONIC HEALTH RISKS ASSOCIATED
WITH THE RELEASE: none.

ADVICE REGARDING MEDICAL ATTENTION: none.

COPIES:

Wayne County Health Department
Attn: Robert Zabick and Thomas Shoens

Detroit LEPC
Attn: George Gaines

Michigan DNR
Attn: Mindy Koch
Attn: Title III Coordinator

Detroit Fire Marshall
Attn: Capt. R. Lang
Attn: Chief #3 - Miller Avenue



DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
(313) 571-7141

April 29, 1991

Ms. Chari Kolak
U.S. EPA Region V 5HR-13
230 South Dearborn Street
Chicago, IL 60604

Dear Ms. Kolak:

Effective June 2, 1990 Dynecol, Inc. was issued a final permit by EPA which addresses applicable provisions of the Hazardous and Solid Waste Amendments of 1984. During the public comment period required for the renewal of our operating permits, allegations were made regarding Solid Waste Management Units located on our site. In order to address these allegations, the H.S.W.A. Permit included the requirement for Dynecol to perform a RCRA Facility Investigation. The first portions of the RFI to be done were Tasks 1 and 2. These were completed and submitted to EPA with-in the required 90 day time frame.

As documented in Task 1, it is Dynecol's opinion that the allegations made during our permit renewal process were unsubstantiated. We have compiled formidable evidence supporting our position regarding each allegation.

Additionally, our permit renewal contained provisions for the expansion of our facility which includes the construction of a Container Transfer Station. The S.W.M.U.'s and our expansion project will cross paths at the location of the 20 underground tanks. These tanks, even though they have been properly closed, will have to be removed to insure the integrity of the new building foundation.

Removing these tanks will without question satisfy the allegation that there are 6 of these tanks which were never closed. The other issues we will address during this project are:

- 1) The potential presence of residual contamination in and around the tank farm; and
- 2) The 4, 1500 gallon tanks allegedly located at the rear of the office and locker room area.

The remaining issues identified in our permit have been satisfactorily addressed in our original submittal and in our opinion do not require additional investigation.

4111

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April 29, 1991

Ms. Kolak continued

Page 2

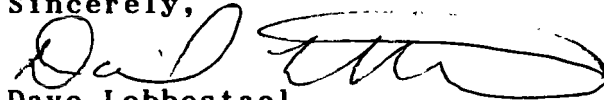
As stated, we believe that any allegations about contamination were unfounded and have not been substantiated. This perspective puts us in the position of managing the closure for the purpose of verification of our Task 1 statements and not a Corrective Action situation.

I have attached a work scope with a sampling and analysis plan that we feel will confirm the non-existence of contamination or unknown tanks.

The removal project is starting on April 29, 1991. We anticipate approximately 2 weeks of work prior to getting to the sampling phase. We will need to have any comments or modifications to our plan prior to May 10, 1991. Should no comments be received by then, we will assume that our plan is satisfactory and we will continue as indicated.

Your cooperation in assisting us to resolve these issues will be deeply appreciated.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dave Lobbestael", with a stylized, flowing script.

Dave Lobbestael
Manager, Business Development

Dynecol, Inc.

Work Plan

Solid Waste Management Units

April 29, 1991

Phase 1

Excavation Of The 20 Underground Tanks:

- Step 1) Removal of all soils and concrete covering the surface of the tanks. All displaced soils to be relocated around the facility for backfill. The concrete will be sent off site to a crusher.**
- Step 2) Removal of the top portion of the uncovered tanks as required.**
- Step 3) Removal of all interior contents of the 20 tanks. This material should be clean fill but will be stock piled on site until analytical verification can be done as defined in Phase II.**
- Step 4) The interior of the tanks will then be power washed using a caustic detergent. The tank interiors will then be double rinsed with clean water. A sample of the final rinse will be collected and analyzed as defined in Phase II. All wash residuals will be transferred into the treatment process for disposal.**
- Step 5) The tanks will be removed and the exteriors washed. All residuals from the washing operation will be contained and disposed of in the treatment process. The tanks will then be cut up for off site scrap disposal.**

Phase II

Sampling Procedures For The 20 Underground Tank Farm:

**Step 1) The excavation will be dissected as follows:
(Reference Exhibit A and B)**

- a) The excavation floor will be divided in half;**
- b) Each half will then be divided into quarter sections;**
- c) The east and west walls will be divided in half; and**
- d) The north and south walls will not be divided.**

Step 2) One random soil grab sample will be taken from each individual quadrant.

Step 3) The excavation soil grab samples will be composited by the following procedure:

- a) One Sample for each half of the excavation floor;**
- b) One Sample for the East and South walls; and**
- c) One Sample for the West and North walls.**

Step 4) Four (4) random samples will be taken from the stock piled fill materials removed from the tank interiors. These four grab samples will be composited into one sample.

Step 5) Upon completion of the final rinse of the interiors of the tanks and prior to the removal of the rinse waters, one sample will be taken from each tank.

Phase II

Analytical Requirements:

- 1) Four composite soil samples from the excavation:

Analyzed for all constituents in 40 CFR 261.24
utilizing Method 1311 Toxicity Characteristic
Leaching Procedure.

- 2) One composite sample of the fill material from the
tank interiors:

Analyzed for all constituents in 40 CFR 261.24
utilizing Method 1311 Toxicity Characteristic
Leaching Procedure

- 3) One individual sample from each tank:

Analyzed for Total Concentration of Arsenic,
Barium, Cadmium, Chromium, Lead, Mercury,
Selenium and Silver.

All sampling procedure to be done utilizing the protocols as
defined in "Test Methods for Evaluating Solid and
Physical/Chemical Methods, SW-846 3rd Edition.

Phase III

Investigation of the Alleged 4, 1500 Gallon Tanks:

- Step 1) Removal of all concrete surfaces up to the exterior walls of the locker room and office area. (Reference Exhibit C)
- Step 2) Perform exploratory excavation in two areas as defined in Exhibit C.
- Step 3) Upon defining a two foot grid of the area between the tank farm excavation and the office wall, drive a one inch solid rod down at each two foot intersection to a depth of five feet from existing grade.
(Reference Exhibit C)
- Step 4) Perform exploratory excavations at any location where the rod meets with impenetrable resistance or suspicion of a tank exists.

Conclusions

Phase I

By removal of all 20 underground tanks, there will be no doubt that no tanks remain in this tank farm.

Phase II

Upon completion of the sampling and provided the results are below all regulatory levels as defined in 40 CFR 261.24 the potential of any residual contamination from the tank farm will have been resolved. Verification that the tanks are clean and suitable for scrap will also be documented. The results of analysis regarding the excavated soils will verify their suitability to be utilized as fill at other locations on the facility grounds as needed.

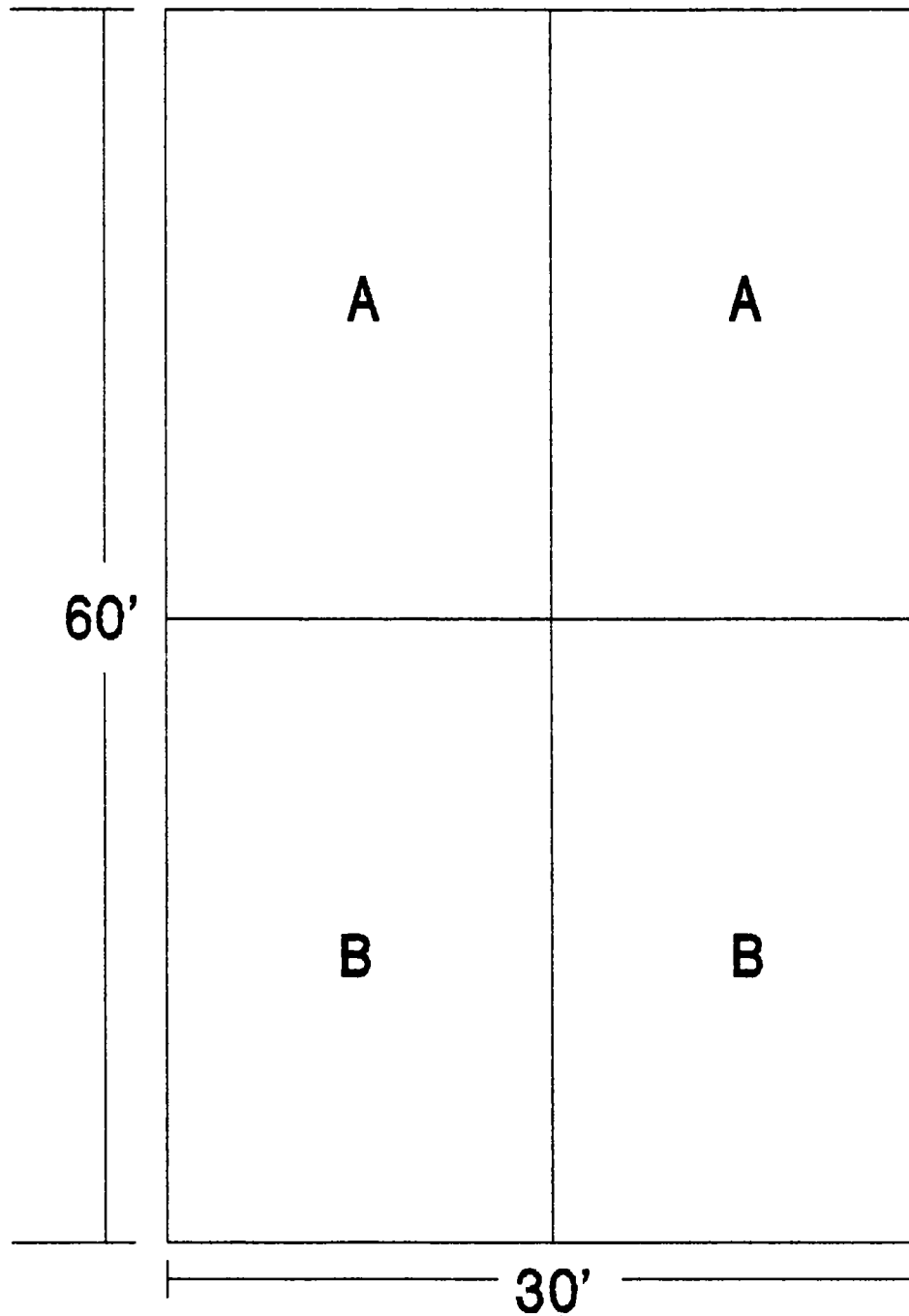
Phase III

Upon completion of the investigation verification that no tanks exist in this area will have been completed.

Exhibit A

Excavation Floor

Sampling Grid

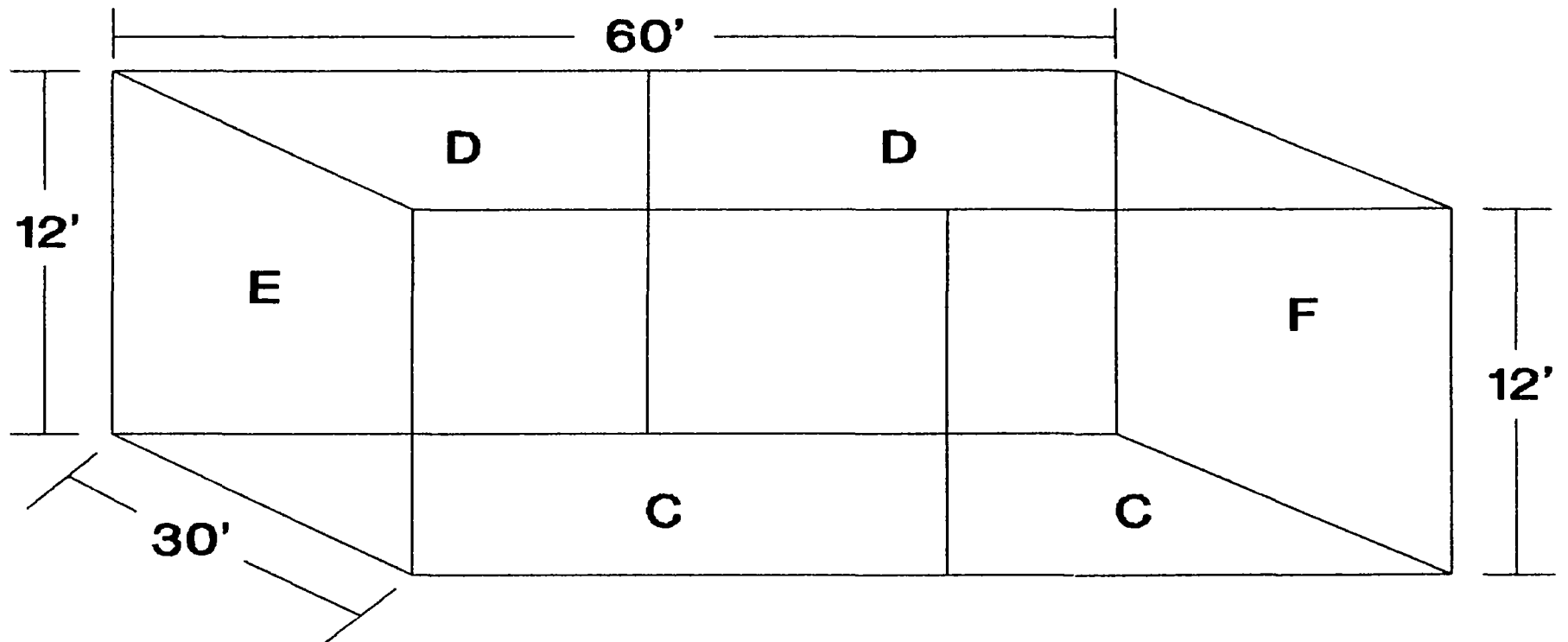


Composite Sample 1 ▪ Quadrants A
Composite Sample 2 ▪ Quadrants B

Not to Scale

Measurements are Estimated

Exhibit B
Excavation Walls
Sampling Grid



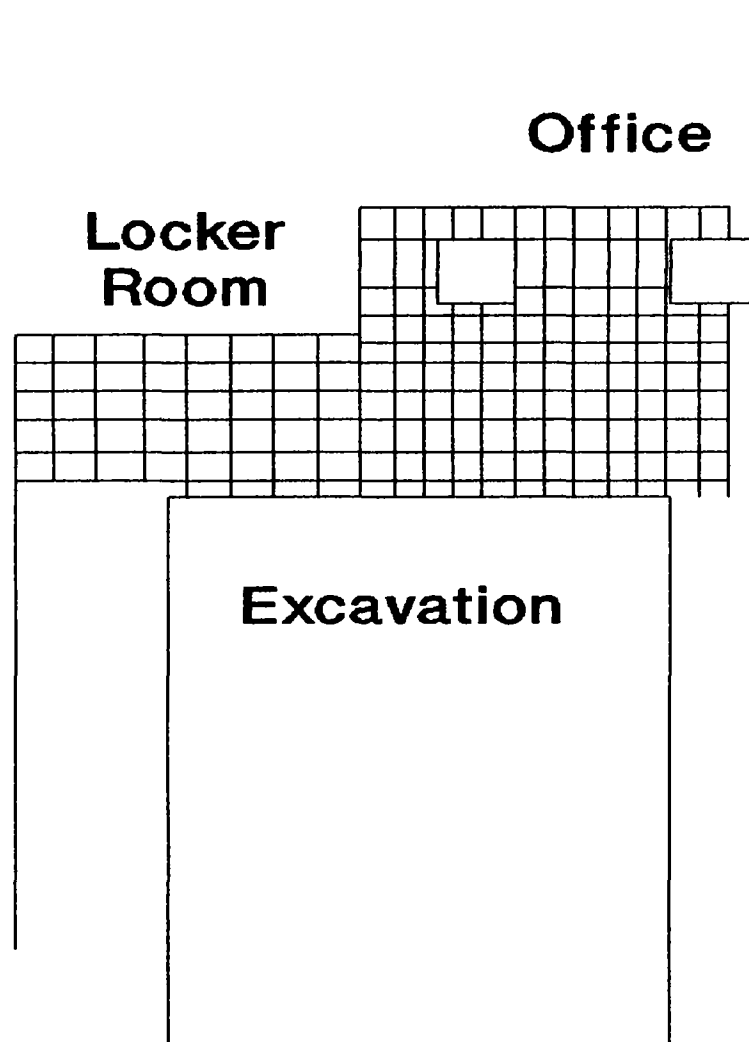
Composite Sample 3 - Quadrants C and E
Composite Sample 4 - Quadrants D and F

Not to Scale

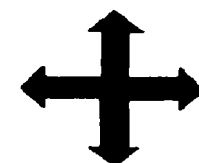
Measurements are Estimated

Exhibit C

Exploratory Excavation Grid



North



Not to Scale
Exact Locations to be
In the Field



DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
(313) 571-7141

2/19/91

U.S E.P.A.
Office of RCRA-5HR-13 Michigan Permitting Section
230 South Dearborn Street
Chicago, IL 60604

- Notice -

Dynecol, Inc. is a commercially operated hazardous waste treatment/storage facility located in Detroit, Michigan. In May of 1990 Dynecol received renewal of it's Michigan Act 64 Operating License and was issued a Final Permit by the United States E.P.A. for the Hazardous and Solid Waste Amendments of 1984.

Effective September 25, 1990 an additional 25 characteristic wastes became regulated under 40 CFR 261 Subpart C.

Dynecol has submitted a Permit Modification adding new waste codes identified in 40 CFR 261.24 to our existing operating permits.

In compliance with 40 CFR 270.42(a)(ii), Dynecol is distributing this notification to all persons on our facility mailing list, as provided to us by the Michigan Department of Natural Resources.

#46



DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
(313) 571-7141

January 17, 1991

Michigan Department of Natural Resources
Hazardous Waste Permits Unit
P. O. Box 30241
Lansing, Michigan 48909

Attn: Mr. Al Howard

Gentlemen:

As previously discussed with MDNR staff, please find enclosed a permit Modification Request that would allow Dynecol to treat certain listed wastewaters, while at the same time upgrading currently permitted equipment and procedures for treatment of F006 and F019 wastes. This submittal includes required page changes to our existing Act 64 permit, as modified by the September 1990 interim status for certain new TC wastes. It pertains solely to our treatment facility and will not affect the container facility operations. Substantive issues to this submittal are discussed below.

Present Permit

Dynecol is permitted to treat F006 and F019. At this time there is no separate system for these wastes, but rather they are processed through the same tanks and filter presses that process permitted characteristic wastes, subject to certain segregation and decontamination procedures. While these procedures are satisfactory, it has been suggested by MDNR staff that a completely separate process loop would be viewed as an enhancement to our listed waste practices and procedures.

Listed Wastewaters

Submitted herein is a completely redesigned Listed Waste treatment system. The wastes to be treated in this system will be subject to the same hazardous characteristic limitations that are in the current Act 64 permit, as well as all other current permit limitations. For example, the scrubber water from a hazardous waste incinerator may in fact only contain a few trace characteristically hazardous metals, but in fact would carry many additional listed waste codes dictated by 40 CFR 261. These and other similar wastes are well within Dynecol's capabilities.

The treatment technologies to be utilized for processing these listed wastes are identical to those incorporated in the treatment of both the organic and inorganic characteristic wastes that we currently accept. Additionally, we have not modified any of the restrictive language in the permit that would alter any characteristic of a specific listed waste. For example, a listed waste having a waste code of F011 would still be limited to 20 ppm Cyanide content; or an F005 would have to have a flash of greater than 140 degrees F, among other current screening parameters in the Waste Analysis Plan.

Process Equipment

To create a separate process loop for F006, F019 and Other Listed Hazardous Wastes (as defined in permit modification request), Tank #10 will be dedicated to this system. The existing tank will be replaced with a 20,000 gallon FRP tank similar to those currently in service for secondary treatment. High level shut off will be installed at the 12,000 gallon level, with additional tank volume installed for emergency containment due to the desire for complete segregation under any foreseeable circumstances. All piping, through and including a third filter press, will be completely segregated.

Air and Water

Application has been submitted to Wayne County Health Department (copy attached) to vent tank #10 through the scrubber. Detroit Water and Sewerage Department has acknowledged our intent (copy attached) to discharge new filtrates. As expected, their position is that so long as Dynecol does not significantly change the discharge characteristics, our current discharge permit will be valid.

Submittal

Enclosed herewith, in addition to the above mentioned attachments and the revised operating license pages, are an amended Operating License Application Form and an amended Part A Application Form and related HSWA permit modifications.

We would appreciate your earliest possible response and understand your current intent to process this request along with our submittal of September 24, 1990 pertaining to TC wastes.

Sincerely,


Frank J. Biermann

cc: EPA - Region V



DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
(313) 571-7141

January 7, 1991

Mr. Alvin Sheans
Chief Engineer - Permits
Wayne County Health Department
Air Pollution Control Division
2211 E. Jefferson
Detroit, MI 48207

Dear Mr. Sheans:

On June 13, 1986, Dynecol, Inc. was issued by Wayne County Health Department an Approval of Installation Permit (copy attached) for numerous storage tanks vented through a Caustic Recycle Scrubber. We subsequently completed installation and have operated in a satisfactory manner with this scrubber system.

Since that time we have made various improvements to our current facility, including the permitting of four secondary treatment tanks vented to the scrubber and installation of a dust collector for our lime storage.

We hereby request that the following three modifications be made to the conditions issued on 6/13/86:

1. Tanks #1 thru #4 should be referenced under Permit C - 6917. This permit was in fact issued to cover installation of the scrubber and Primary Treatment tanks, but the tanks are nowhere mentioned. It is a minor point, but it is repeatedly a point of interogation from various regulatory agencies, operations auditors, etc.
2. Special Condition number 17 is outdated with respect to waste codes for which Dynecol is permitted by DNR and EPA. On July 27, 1987, Michigan DNR amended our Act 64 operating permit to reflect certain metal waste codes, as well as the potential to treat two F Series listed wastes. In September of 1990 Dynecol was also granted interim status for certain of the new TC wastes then promulgated by EPA. With the exception of the metal waste codes, none of these additions has changed the permitted chemical characteristics of the wastes that we have been processing, nor has any of these additions changed our capability to comply with air quality requirements.

A copy of the relevant waste codes is attached for your reference.

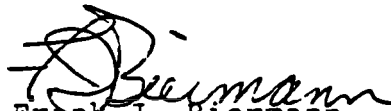
3. In addition to the request above to clarify C - 6917, we request that tank #10 be added to the list of treatment tanks vented to the scrubber, either as an addition to C - 6917 or as a new permit. This request is predicated upon two issues: a) MDNR would prefer for our process to isolate listed wastes into a separate treatment tank and filter press, and b) we are currently submitting a request to MDNR to expand our permitted listed wastes to receive certain waste waters not now on our permit.

It is fully expected that any newly permitted wastes will be subject to the same hazardous Characteristic limitations that are in our current Act 64 permit, as well as other current permit limitations. and that any resultant air discharge will be within the limitations of the 6/13/86 Air Permit.

By way of explanatory background, Dynecol initiated this petition with MDNR in response to an opportunity to process an incinerator scrubber water that is characteristically hazardous only for a few trace metals, but carries numerous listed waste codes because of the "derived from" rule. Please note that this Act 64 permit modification would necessitate a further modification to Special Condition Number 17 by the addition of the petitioned codes attached herewith (Table C.1).

In conclusion. it is our belief that the changes requested herein are consistant with Dynecol's desire to continue its fine record with regard to air quality. Please advise me promptly if you need further information to process this request.

Yours truly,


Frank J. Biermann
President

FJB/cam

Attachment

December 13, 1990

Stephen J. Kuplicki, P.E.
Detroit Water and Sewerage Department
Industrial Waste Control Division
303 S. Livernois
Detroit, MI 48209

Re: DWSD Permit No. 003-039

Dear Mr. Kuplicki:

Dynecol, Inc., operates a Commercial Waste Treatment facility that currently discharges process effluent under the permit referenced above. Dynecol operates its facility under an Act 64 permit issued by Michigan DNR and also discharges some non-hazardous effluent. Our Act 64 Permit allows us to process thirty six different hazardous waste codes, thirty three of which are Characteristic wastes (i.e. corrosive or toxic) and three are Listed wastes.

Please be advised that Dynecol is currently petitioning MDNR to expand our permitted Listed wastes to receive certain waste waters not now on our permit. It is fully expected that any newly permitted wastes will be subject to the same hazardous Characteristic limitations in our current permit, as well as other current permit limitations, and that any resultant effluent will be discharged within the requirements of our DWSD permit.

By way of explanatory background, Dynecol initiated this petition with MDNR in response to an opportunity to process an incinerator scrubber water that is characteristically hazardous only for a few trace metals, but carries numerous listed waste codes because of the "derived from" rule.

I would appreciate your returning the attached acknowledgement copy to my attention. Additionally, I would be pleased to answer any questions you might have or to receive any comments.

Yours truly,

Frank J. Biermann
President

*So long the effluent characteristics
do not change, the permit will be valid,
Otherwise the acceptability of Dynecol's waste will be reevaluated*

Acknowledged for DWSD

Q. S. Jain

*Jain S. Jain Ph.D., P.E.
Head, Pretreatment Program (IWC)
Detroit Water & Sewerage Department*

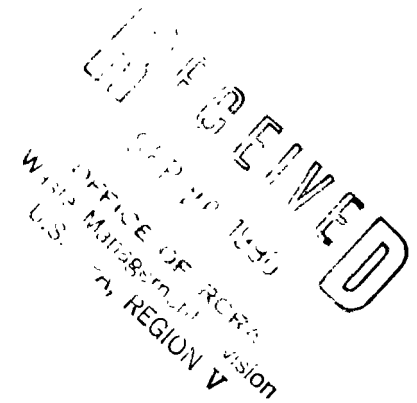


DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
(313) 571-7141

September 24, 1990

Michigan Department of Natural Resources
Hazardous Waste Permits Unit
P.O. Box 30241
Lansing, Michigan 48909



Gentlemen:

In response to the August 31, 1990 letter from MDNR (Ms. Cheryl Howe) to Dynecol, Inc. (MID 074259565) regarding new Toxic Characteristic waste codes, I am pleased to enclose a Modification Request to add certain of the TC waste codes to our Act 64 operating license and HSWA permit. Briefly stated, Dynecol requests that, as detailed below, all new characteristic and listed TC waste codes be added to our Containerized Storage and Containerized Bulking/Transfer activities, and that certain of those same codes be added to our General Facility bulk treatment operations.

The necessity for these changes is twofold. First, as new waste codes are added, our Container Facility would need to have such codes permitted in order to provide transfer services to generators of these wastes. Secondly, within our treatment operations there are numerous current and potential generators who have or may have some of the TC organic waste constituents in their wastes. We are currently treating certain non-hazardous wastes that will be reclassified as hazardous because of TC organics. Additionally, some of our currently hazardous waste streams will likely require one or more of the new designations because of their trace organic contamination. A prime example of this situation would be certain K062 wastes (a significant portion of Dynecol's business) that are generated through the pickling of steel that has finishing oils associated with it. Many of Dynecol's characteristic waste streams are also generated by various metal finishing operations.

Container Operations

It is proposed that all new TC waste codes be permitted for container storage and that each of these codes be permitted for bulking. A comparison of these new contaminants with those previously approved by Wayne County Air for bulking indicates that these would be found suitable. Wayne County has not given final approval yet; therefore, any bulking would be subject to their modification of the applicable air permit.

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MDNR continued

Page 2

Treatment Operations

Dynecol has in place the capability to treat all of the TC organics. However, as indicated by our Act 64 Modification Application, Pesticides and Herbicides have been omitted, as well as D030 and D038. Capability to treat has been demonstrated out of two principal necessities. Certain non-hazardous streams (e.g. groundwater contaminated with Benzene and its derivatives) have been treated and organic constituents successfully mitigated out of concern for BOD and COD contamination. Additionally, in the Spring of 1990 the Detroit Water and Sewage Department (DWSD) issued draft regulations that called for control of TTO's. Each of these developments caused Dynecol to evaluate treatment alternatives. More specifically, Dynecol has installed an activated carbon filtration system for polishing filter press effluent. This system can effectively treat each of the TC organics in the application. Additionally, treatment technology demonstrations confirm the effectiveness of precoating the filter press with diatomaceous earth and/or carbon, as well as the addition of activated carbon as an adsorption medium in secondary treatment.

Submittal

Enclosed herewith, in addition to the Amended Operating Licence Application Form, is an amended Part A Application Form and related HSWA permit modifications, as well as revised replacement pages for the Operating License. Dynecol believes this submittal to be accurate, complete, and timely. Per MDNR directions on page 2 of the aforementioned August 31, 1990 letter, Dynecol anticipates waste acceptance of certain applicable TC wastes, subject to the tracking provisions of the MDNR manifest system and the license modifications as submitted.

In the event that you have any questions or comments, please contact us promptly.

Sincerely,


Frank J. Biermann
President

cc: U.S. Environmental Protection Agency



DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
(313) 571-7141

August 14, 1990

Mr. David Petrovski
Geologist
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dear Dave:

I would first like to thank you for taking time out of your schedule to meet with me. As I confirmed, both Dynecol and myself are committed to complying with all of the provisions in our operating permits.

The objective of the meeting was primarily to present and solicit feedback regarding the documentation gathered to date for responding to the Request for Information which includes Tasks I and II.

Upon a cursory review of the overall package, you had several comments which are summarized as follows:

1. The report should be structured in the same chronological order as is reflected in the R.F.I. This will help to provide ease in following the individual responses to specific items.
2. All drawings, including any added comments, need to be made large and legibly enough to facilitate easy reading.
3. It was suggested that the drawings or maps reflecting documentation regarding the location of real and perceived solid waste management units be color coded referencing their current status or their potential non-existence.
4. The topographical maps as presented are acceptable for the Task I submittal.
5. The Compliance Summary, once up-dated to reflect recent history, will be sufficient for this stage of the process.

August 14, 1990

Mr. Petrovski continued

Page 2

6. Although Section B is in some cases redundant, the information requests are intended to focus on reflecting the current status of the situation. There are parts of Section A that can be used again to respond to parts of Section B.

Also, during our discussion regarding the objective of Task I and II, it became apparent that Dynecol's intent to begin any subsurface verification of information was premature. Based on your explanation, it is now our understanding that the first stages of the R.F.I. are designed to gather all established and available data regarding the site. This is also an opportunity for Dynecol to take a position regarding any of the allegations of solid waste management units or contamination.

Although, as noted above, negotiation regarding the subsurface verification process is premature, I believe the valuable discussion we had regarding the issue of addressing the potential of contamination in the closed tank farm is worth confirming. The one potential scope of work discussed is as follows:

1. Two mechanical borings would be preformed near alternate ends of the tank farm to a depth of approximately 14 feet or 18 inches to 20 inches below the bottom of the tanks.
2. Continuous samples of the borings will be collected and composited.
3. A single composited sample will be scanned for all the constituents of Appendix 8.
4. If available, one composite sample of the groundwater will be taken.
5. The groundwater will be scanned for all constituents Appendix 9.

In summary, it appears that the documentation presented, subject to your suggested modifications, will satisfy the requirements of Tasks I and II. We also understand that additional information may be requested or a continuation to Task III may be necessary.


August 14, 1990

Mr. Petrovski continued

Page 3

I would again like to thank you for your time and input. In my opinion our meeting was very productive and most helpful. Defining the intention of Tasks I and II will definitely assist in focusing our efforts in the proper direction. At this time we anticipate meeting the August 31, 1990 objective for submittal.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dave Lobbestael', with a large, sweeping flourish at the end.

Dave Lobbestael
Manager - Business Development

cc: Ms. Cheryl Howe MDNR
Mr. Frank Biermann Dynecol



DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
(313) 571-7141

RECEIVED
AUG 21 1990

August 3, 1990

OFFICE OF
Hazardous Waste Management
U.S. EPA Region V on

Ms. Cheryl Howe
Senior Environmental Engineer
Hazardous Waste Permits Unit
Michigan Department of Natural Resources
Stevens T. Mason Building
P.O. Box 30028
Lansing, MI 48909

Dear Ms. Howe:

I have asked Dave Lobbestael to follow up with you on your letter to us dated July 31, 1990. However, I wish to personally address your first paragraph regarding Dynecol's permit compliance. Rightly or wrongly, we began our 60 day time period for responding to Condition II.Q.1. at the time we received our licence on June 5th. My purpose here is not to debate the point any further, but only to offer Dynecol's explanation.

Henceforth, we will comply with all schedules based upon an issue date of May 2, 1990.

Yours truly,

Frank J. Biermann
President

FJB/cam

cc: Mr. Dave Lobbestael
Mr. Rich Traub, U.S. EPA
Ms. Marilyn Sabadaszka, U.S. EPA
Dr. Ben Okwumabua, DNR-Livonia
Mr. Steve Buda, DNR
Mr. Dennis Drake, DNR
HWP/C&E File

Leb

RECEIVED
JUN 21

NOTICE OF FINAL DECISION

Dynecol, Inc.
Act 64 Operating License

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

The Michigan Department of Natural Resources (MDNR) issued a hazardous waste management facility operating license to Dynecol, Inc. (MID 074 259 565) pursuant to 1979 P.A. 64, as amended, the Michigan Hazardous Waste Management Act. The license was issued May 2, 1990 and allows Dynecol to continue to operate a hazardous waste storage and treatment facility at 6520 Georgia in Detroit, Michigan. Dynecol also received a federal permit issued by the U.S. Environmental Protection Agency (U.S. EPA), pursuant to the Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The HSWA permit became effective June 2, 1990. Both the Act 64 license and the HSWA permit will expire five years from the date of issuance.

The final Act 64 operating license and HSWA permit may be reviewed at the MDNR, Waste Management Division Office, located on the first floor of the South Ottawa Building in Lansing, Michigan (contact Ms. Cheryl Howe at 517-373-9881), at the MDNR Detroit District Office, located at 505 W. Main Street in Northville, Michigan (contact Mr. Donald Mbamah at 313-344-4670) and at the Wayne County Health Department, Air Pollution Control Division, located at 2211 E. Jefferson in Detroit, Michigan (contact Ms. Kay Bedenis at 313-567-0710). A copy of the license may be obtained, for the cost of reproduction, by contacting Ms. Jan Adams at 517-373-2730. Questions or comments concerning Dynecol should be directed to Ms. Cheryl Howe at 517-373-9881.

MAR 30 1982

5H-12

CERTIFIED MAIL P 611 589 631
RETURN RECEIPT REQUESTED

Mr. Frank Bierman
Dynecol, Inc.
6520 Georgia Street
Detroit, Michigan 48211

RE: Dynecol, Inc.
Final Permit
MID 074 259 565

Dear Mr. Bierman:

Enclosed is a copy of the final permit issued by the United States Environmental Protection Agency (U.S. EPA), which addresses the applicable provisions of the Hazardous and Solid Waste Amendments (HSWA) of 1984. The pre-HSWA permit is being concurrently issued by the Michigan Department of Natural Resources (MDNR). The effective date of the final permit is specified on the permit cover sheet.

The duration of the permit is five (5) years. However, the U.S. EPA may modify, revoke, reissue, or terminate this permit based on Title 40 of the Code of Federal Regulations (40 CFR) 140.10 and 270.43.

You have the right to appeal any conditions of the permit under Section 124.19. The appeal is to be addressed to the U.S. EPA and must be received within 33 days from the date of this administrative appeal step must be completed prior to judicial review. The failure of your Company to meet the conditions of the permit may result in civil and/or criminal penalties.

Sincerely,

David A. Ullrich, Acting Director
Waste Management Division

Enclosure

P 611 589 631

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

* U.S.G.P.O. 1983-403-517 PS Form 3800, Feb. 1982	Sent to	Frank Bierman
	Street and No	6520 Georgia Street
	P.O. State and ZIP Code	Detroit, Michigan 48211
	Postage	\$ 2.40
	Certified Fee	.65
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt Showing to whom and Date Delivered	2-4-82
	Return Receipt Showing to whom, Date, and Address of Delivery	
	TOTAL Postage and Fees	\$ 3.05
Postmark or Date		

5H-13/RCRA PERMITTING BRANCH/MICHIGAN SECTION/D.P.

bcc: R. Traub
D. Petrovski
File

5HR-JCK-13/DAVID PETROVSKI/March 16, 1990/6-0997/FMD F:/DYNECOL.LTR

	TYP.	AUTH	ILS CHIEF	INS CHIEF	MIS CHIEF	MNWI CHIEF	OHS CHIEF	RPB CHIEF	WMD DIRECTR	RCRA ADD
INIT. DATE	AD	3-20-90			3/20/90			3/29/90	3/29/90	3/29/90

INTEROFFICE COMMUNICATION

November 14, 1989

TO: Steve Buda, Chief
Hazardous Waste Permits Unit

FROM: Cheryl Howe, Senior Permit Engineer
Hazardous Waste Permits Unit

SUBJECT: Dynecol, Inc. Operating License
MID 074 259 565

Issuance of the Dynecol, Inc. operating license for the storage/treatment facility is a first quarter grant commitment for FY-90. I will need four to six additional weeks to issue the license, depending upon whether public comments are received. If no comments are received, I should be able to prepare the license for issuance by the end of January 1990.

The license cannot be issued as was originally scheduled because it has taken longer than expected for the air permits to be drafted for the new container storage facility which the company intends to construct. I just received the draft air permit conditions on November 10. New information provided to Wayne County Air Pollution Control Division in order to obtain the air permits have necessitated revisions in several sections of the license application. These revisions will be submitted by November 17 and are needed as part of the license attachments.

I spoke with Wayde Hartwick about the revised schedule to make sure the HSWA permit is being drafted and told him that the public notice will be published the week of December 4, 1989, and that the public hearing will be held during the week of January 8, 1990. The draft public notice and license will be sent for sign-off at least two weeks prior to publishing.

#2



DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
(313) 571-7141

March 7, 1990

Mr. David M. Petrovski
United States Environmental Protection Agency
RCRA Permitting Branch (5HR-13)
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Petrovski:

The following comments are offered relating to Dynecol, Inc. Draft RCRA Permit (MID 074 259 565) and a February 24, 1990 letter on this subject from Brenda J. LiveOak to MDNR:

1. Relating to the 20 underground tanks described in my letter to Mr. Wayde Hartwick on April 1, 1989 and referenced in your Draft, our best approximation of their size remains at 5,000 gallons. In fact, our approximation of their 6' X 12' size would yield a smaller volume. This is only our best estimate, however.
2. Relating to the alleged "at least four 1,500 gallon tanks", I have discussed this issue with several employees who have long tenure at Dynecol. I have no knowledge of any underground tanks except those twenty noted above (and our fuel tank). However, I am readily willing to investigate whatever evidence Ms. LiveOak might have and to take action appropriate to the veracity of her allegation. I will contact her in the near future to discuss her basis for the allegation.

Very truly yours,

A handwritten signature in cursive script that reads 'F. Biermann'.

Frank J. Biermann
President

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

RECEIVED
MARCH 13 1990

#24

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

June 19, 1989

TO: Cheryl Howe, Permits, WMD

FROM: Nadine L. Romero, Geotech Unit *MLR*

SUBJECT: Dynecol Act 64 Operating License Reapplication
Review Comments MID 074 259 565

I have reviewed the Act 64 Operating License Reapplication for Dynecol, Inc., submitted October 10, 1988, for technical adequacy and completeness in accordance with P.A. 64 as ammended 1979 and 40 CFR 264, Subpart F. This revised submittal includes a new hydrogeologic and engineering report addressing many of the deficiencies as outlined in my review memo of September 8, 1986 and appears to be fairly complete. There are however, a few technical deficiencies which should be addressed for final approval of the Dynecol Act 64 Operating License.

1. A statistical method complying with the performance standards of 40 CFR 265.97 (g) (h) and (i). This includes establishing an adequate number of background samples (at least 16) and qualifying the chosen statistical method as outlined in 40 CFR 265.97 (h) and (i).
2. Boring log SB-5-88 does not show the lithology from the ground surface elevation down to 29.8 feet. The gamma log of SB-5-88 appears to show a distinct sand or silty unit around 25.5 to 30 feet below surface, this does not appear on the boring log. Generally good correlation was found between the gamma and boring log of SB-6-88. On page E-7 of the application, three 60 foot soil borings were said to have been geophysically logged, however, the report does not give the 3rd gamma log.
3. The term 'useable' is not part of the Act 64 terminology or minimum requirement standards, as all aquifers under

Act 64 are considered 'useable'. The purpose of the hydrogeologic study is to define the 'uppermost' aquifer and those aquifers hydraulically connected. In addition, ground water monitoring programs are not granted waivers based on the definition of 'useable' aquifers.

4. The application requests the option of applying for a waiver if difficulty occurs in obtaining water samples from the ground water monitoring system (p. L-16). If the present ground water monitoring system is not adequate in obtaining representative ground water samples then additional wells will need to be installed, as necessary to complete an adequate ground water detection system. Several of the boring logs suggest other deeper saturated and semi-saturated units which would be target areas for ground water monitoring. Dynecol should note that the MDNR may be conducting sampling inspections and ground water monitoring evaluations in the near future, of treatment and storage facilities in addition to land disposal facilities. During such comprehensive monitoring evaluations (also referred to as a CME) a split sampling, field inspection, statistical and hydrogeological evaluations are conducted for determination of compliance with the Act 64 permit and the 40 CFR 264.97 Subpart F requirements.
5. A ground water flow map(s) should be included in the application, with contour intervals not exceeding more than 1 foot as referenced in R299.9506 (c) and (d).
6. Since Dynecol handles acids, pH is to remain a primary monitoring parameter. Statistically significant increases or decrease in pH may flag a legitimate well problem or contamination. Specific conductance, however, may be used as a secondary monitoring parameter.
7. The closure plan (Section I) should include a statement that if there are any visible cracks in the loading and unloading areas of the treatment tanks or containment area these would be cored and sampled in addition to the low spots. Also, the soil sampling program waiver (Section J) request should state that because the facility is paved, soil sampling will be addressed at the time of closure, providing there are no cracks or avenues for potential soil contamination in the interim.

This concludes my technical review comments for the Dynecol application. I am available for any questions or concerns you have.

Memo to Howe

cc: De Montgomery/Geotech Files
Operating License File

ADMINISTRATIVE RECORD INDEX

2

Please Print

Facility Dynacore

MID # 074 259 565

Item #	Item Date	Description	Item Filed*
69	7-31-91	FAX FROM D. LOHMEYER TO: S. KOLAK RE: UNDERGROUND TANK FEMI-DEMOLITION	2
70	7-19-91	FAX LTR FROM: D. LOHMEYER TO: S. KOLAK RE: UNDERGROUND TANK FEMI-DEMOLITION APPROX	2
71	5-22-91	FAX LTR FROM D. LOHMEYER TO S. KOLAK RE: TANK FEMI-DEMOLITION SAMPLE ANALYSIS	2
72	5-22-91	LTR FROM E. BROWN TO: S. KOLAK RE: MOBILE REVIEW OF DYNACORE'S SAMPLING PLAN	2
73	4-18-90	LTR FROM F. REMSBURG TO: C. HOWE RE: DYNACORE'S ACT 104 OPERATING LICENSE	3
74	4-11-90	LTR FROM F. REMSBURG TO: C. HOWE RE: DYNACORE'S ACT 104 OPERATING LICENSE	3
75	2-22-90	LTR FROM T. PHAM TO: MOORE RE: ANNUAL GROUNDWATER REPORT	4
76	6-13-91	FAX REPORT - Preliminary sample results	4
77	1-16-96	Conversation Record RE: CARBONATE CLASS I PERMIT MOD.	2
78	8-7-95	LTR FROM T. PHAM TO: S. S. HILL RE: CLASS I PERMIT MOD.	3
79	1-25-96	Facility Public Notice - Copy of Notice	4
80	1-11-96	Copy of Public Notice for new waste codes	4
81	6-6-96	LTR FROM H. CHEN TO: H. BUCKER RE: PERMIT REAPPLICATION WORK	2
82	5-23-96	LTR FROM H. BUCKER TO: H. CHEN RE: RECEIPT OF PERMIT REAPPLICATION	2
83	1-26-96	LTR FROM D. LOHMEYER TO: S. KOLAK RE: CLASS I PERMIT MOD.	4
84	4-8-96	LTR FROM S. KOLAK TO: D. LOHMEYER RE: CLASS I PERMIT MOD.	2
85	5-6-96	LTR FROM J. PHAM TO: P. D. MOORE RE: MEETING SCHEDULE	2
86	7-11-96	LTR FROM P. DALEY TO: T. PHAM RE: PERMIT REAPPLICATION	2
87	2-7-97	LTR FROM D. DALEY TO: H. BUCKER RE: MOD/LETTER OF WRITING	2

ADMINISTRATIVE RECORD INDEX

Please print

Facility

M ID #

074.259 565

[illegible]

* Folder 1 is arranged by sections.

ADMINISTRATIVE RECORD INDEX

Please Print

Facility Dynecol Inc.

ID # MD 074 259 565

Item #	Item Date	Description	Item Filed*
45	7-15-91	Corrective Action: Progress report for closure of underground storage tank	4
46	2-19-91	FACILITY MAILING OF NOTIFICATION OF CLASS I MOD. FOR TC	5
47	8-14-90	Letter from Facility to: Agency Re: Request for Information for RFI Task I	3
48		MODIFIED PERMIT PAGES 175 CLASS I MODIFICATION FOR TC UPDATES	5
		(VOL I & II) ACT 604 APPLICATION (Sept, 1989)	FILE ROOM
50	9-4-91	Review of Final design plans for burial waste container storage area	FOLDER 1 2
51	9-13-91	Approval of H.W. container storage construction & construction extension	FOLDER 1 2
52	2-10-92	Telephone conversation log re: act 604 permit modification document	3
53	6-10-92	Letter from parent to facility RE: Permit for burial organic hazardous waste for storage	2
54	5-5-92	Letter from parent Re: Approval to begin accepting inorganic H.W. for container storage	2
55	7-15-92	Letter from facility Re: Closure of Solid Waste Management Unit	2
56	8-30-90	Transmittal Letter for RFI TASK I & II Report (VOL. I & II FILE ROOM)	3 - FILE ROOM
57	8-14-90	Letter to Mr. Petrowski from: Dave Hobbes Re: Summary of meeting for RFI requirements	3
		(Meet entry number 48 is in)	
		FOLDER 1 2	
58	10-27-94	LR TO: Frank Biermann FROM: Jim Sygo RE: Act 604 License Reapp. (advis) Extension	2
59	11-15-94	LR: FROM R. Tran TO: F. Biermann RE: Reapplication Extension Request Approval	2
60	9-13-91		
61	1-3-95	LR: FROM T. Pham TO: Cheryl Howe ACT 604 Permit Reapplication Submitted	2
62	1-5-95	LR: FROM T. Pham TO: Cheryl Howe RE: Update to RFA Reapplication	2
63	4/8/95	FAX: Reapplication Table of Contents	2
64	1-3-95	LR: FROM T. Pham TO: Shouker (Cover RFA) RE: RFA Permit Reapplication Submitted	2

↳ (2 volumes in file room)

Summary Document
Vol. I & II

ADMINISTRATIVE RECORD INDEX

Please Print

Facility DYNECOL, INC.

ID # MID 074 259 565

<u>Item #</u>	<u>Item Date</u>	<u>Description</u>	<u>Item Filed*</u>
✓ 23		PUBLIC COMMENTS ON DRAFT PERMIT	6
✓ 24	3-7-90	COMMENTS FROM DYNECOL	6
✓ 25	1-22-90	PERMIT APPLICATION REVISIONS	2
✓ 26	1-23-90	PERMIT APPLICATION REVISIONS	2
✓ 27	2-21-90	STATEMENT MADE AT PUBLIC HEARING FOR HSWA PORTION OF DRAFT	6
28		DRAFT ACT 64 PERMIT AND ATTACHMENTS	FOLDER 3
✓ 29		TRANSCRIPT OF PUBLIC HEARING	6
30	1-18-90	COPY OF PUBLIC NOTICE IN DETROIT FREE PRESS	6
31		RESPONSE TO COMMENTS	6
32	3-30-90	COVER LETTER FOR FINAL PERMIT	2
33		SIGN OFF SHEET (FINAL PERMIT)	6
34		FINAL PERMIT	6
35		FINAL STATE ACT 64 PERMIT	SEE SEPARATE Folder 4
36	2-6-91	CLASS I PERMIT MODIFICATION FOR TC WASTE	5
37	1-24-91	Permit Modification for TC WASTES	4
38	9-24-90	Permit Modification for TC WASTES	4
39	5-10-91	LETTER TO FACILITY REGARDING CORRECTIVE ACTION	4
40	6-6-91	LETTER TO FACILITY REGARDING sampling plan FOR underground tank farm area	4
41	4-29-91	LETTER FROM FACILITY REGARDING WORKPLAN FOR underground storage tank farm (SUMMIT)	3
42	5-12-91	LETTER FROM FACILITY REGARDING CORRECTIVE ACTION	4
43	7-13-91	NOTIFICATION OF July 5, 1991 AIR RELEASE	4
44	7-31-91	Closure Approval of underground storage tank area	4

ADMINISTRATIVE RECORD INDEX

Please Print

Facility DYNECOL INC.ID # MID 074 259 565

Item #	Item Date	Description	Item Filed*
1A		LOG	SECTION 1
✓ #1	12-5-89	APPLICATION REVISIONS	2
✓ 2	11-14-89	DNR INTEROFFICE MEMO REGARDING A DELAY IN PERMIT ISSUANCE	2
✓ 3	2-20-89	APPLICATION REVISIONS	2
✓ 4	7-6-89	" "	2
✓ 5	6-26-89	" "	2
✓ 6	10-6-88	SWMU CERTIFICATION DOCUMENT	3
✓ 7	1-31-89	RFA NOTICE LETTER	3
✓ 8	1-31-89	SIGN-OFF COPY FOR RFA NOTICE LETTER	3
✓ 9		RFA/USI REPORT	3
✓ 10	4-11-89	LETTER FROM DYNECOL TO REGION 5 REGARDING RFA INFORMATION REQUEST	3
✓ 11	3-16-89	MEMO FROM W. HARTWICK TO R. TRAUB REGARDING RFA SUMMARY	3
✓ 12		MDNR'S ORIGINAL FACT SHEET	4
✓ 13		MDNR'S REVISED FACT SHEET	4
✓ 14	11-2-89	DRAFT ACT 64 RCRA PERMIT	5
✓ 15		ORIGINAL PUBLIC NOTICE AND PUBLIC SERVICE ANNOUNCEMENT	6
✓ 16		REVISED PUBLIC NOTICE AND PUBLIC SERVICE ANNOUNCEMENT	6
✓ 17		DRAFT FEDERAL PERMIT	5
✓ 18		FEDERAL FACT SHEET	5
19		ACT 64 APPLICATION (PART A & PART B)	FOLDER 1
20		" " " " "	FOLDER 2
✓ 21		COVER LETTER ON DRAFT PERMIT	2
✓ 22		SIGNOFF SHEET FOR DRAFT PERMIT	5